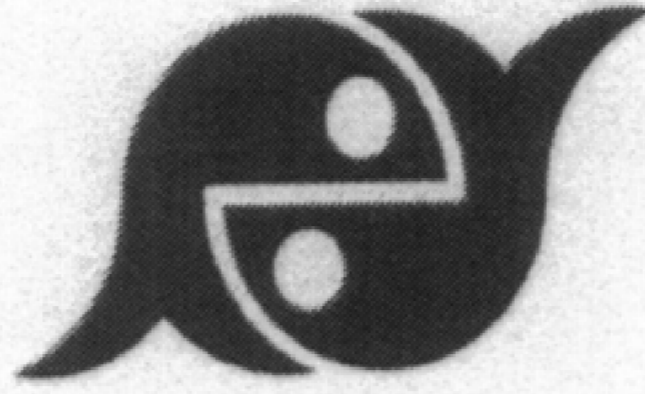




# IDAS LTD.



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Date: 8/2/17

Deirdre Morgan  
Secretary to the Independent Review Group  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty  
Co. Cork  
[aquaculturereview@agriculture.gov.ie](mailto:aquaculturereview@agriculture.gov.ie)

## Submission to the Independent Aquaculture Licence Review Group

I've been working in this industry for more than 10 years both at home here in Ireland and abroad. Aquaculture is my passion and I would love to see a successful, sustainable industry develop further in this country. From my time working in Scotland it is easy to see how a well regulated, supported aquaculture industry can thrive. There is absolutely no reason why we in Ireland should be lagging behind. I welcome the establishment by Minister Creed TD of the independent review group on licensing. The issue of licensing has in my opinion been the biggest obstacle to Aquaculture for the past 20 years.

I'm currently the General Manager of IDAS Trout Farm Ltd we are based in Woodenbridge, Co. Wicklow and employ 5 people fulltime and one part time and produce 400 tonnes of Rainbow Trout for the Irish Market. The market demand for our product is greater than this and it would be our aim to grow in the future in line thereby creating more employment and bringing value to our local area. I see nothing but support from our customers and our neighbours in Wicklow, our product is top quality, sustainable and we work with our environment every day.

In summary it is my belief that the aquaculture sector needs a properly managed licence system that has:

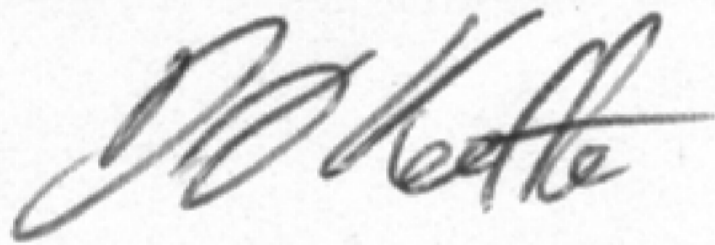
- I feel we need definite timelines – where licences are automatically granted if deadlines are missed by official bodies. The Licensing authority should publish a clearly defined set of steps with the accompanying timelines to guarantee a max turnaround of a license of 12 months.
- A clear and transparent licencing application process for both the applicant and any objectors.
- A minimum of a 20 year licence which will allow aquaculture businesses security to grow and access funding.
- Marine based finfish production should only be managed and defined according to Maximum Allowable Biomass (MAB) which is international best practice.

- Licenses should be simple documents that comprise only the legally binding content on a template to which all conditions and any protocols can be annexed to.
- No additional EIS required for a change in license terms where no significant increase in Environmental Impact will result.
  
- Renewals of licences based on good standing, adherence to licence conditions and monitoring results.
- Released the ability to seek funding from the EMFF for updating technology and equipment
- A reduction in the cost of the extremely complex Environmental Impact Statements required.
- More experience of the business within the department itself – similar to the knowledge contained within other sections in relation to farming beef, sheep or dairy.
- No need to change currently legislation it is more than fit for purpose.
- Clear timeframes on the implantation on any changes submitted by the review group need to be put in place follow it's report.

These are just some of this issues we need to see addressed and we have been waiting for action in this area for far too long. It is acknowledged government and EU policy to develop this sector but that aspiration needs to be turned into action for the sake of the next generation.

Please do not hesitate to contact me if you require any further input.

Yours Sincerely,



Damien O'Keeffe

General Manager

IDAS Trout Farm Ltd

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